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ORIGINAL

REDACTED - FOR PUBLIC INSPECTION

RECEIVED

July 8, 2005

JUL - 8 2005

Federal Communications Commission
Office of Secretary

VIA HAND DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Redacted Version of Confidential Filing; Joint Application for Consent to Transfer Control of Military Communications Center, Inc., a Company Holding a Domestic 214 Authorization, from MCI, Inc. to MCC Acquisition Corporation, WC Docket No. 05-223*

Dear Ms. Dortch:

This letter provides notice for the public record that the undersigned counsel to MCI, Inc., filed today a copy of a confidential letter to Alex Johns, Competition Policy Division, Wireline Competition Bureau, under seal along with the attached request for confidential treatment. The unredacted, confidential version of this filing is being hand delivered to you.

Two copies of the filing, as redacted, are also being submitted, as attachments to this letter. If you have any questions or require further information, please do not hesitate to contact me.

Sincerely,



A. Renée Callahan

Attachments

cc: Alex Johns, Competition Policy Division, Wireline Competition Bureau

No. of Copies sent 021
List ABOVE

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**REQUEST FOR CONFIDENTIAL TREATMENT
PURSUANT TO 47 C.F.R. §§ 0.457 AND 0.459 IN WC DOCKET NO. 05-223**

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Federal Communications Commission
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Re: *Joint Application for Consent to Transfer Control of Military Communications Center, Inc., a Company Holding a Domestic 214 Authorization, from MCI, Inc. to MCC Acquisition Corporation, WC Docket No. 05-223*

Dear Ms. Dortch:

Pursuant to Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and the Commission's rules, 47 C.F.R. §§ 0.457(d) and 0.459, MCI, Inc. ("MCI") hereby requests confidential treatment of certain sensitive business information provided in the attached letter from the undersigned counsel for MCI, to Alex Johns, Competition Policy Division, Wireline Competition Bureau. The letter includes confidential commercial information that reveals MCI's current plans to compete for a specific customer. MCI is submitting a public, redacted version of this letter together with a nonpublic, unredacted version filed under seal subject to this request for confidential treatment.

1. *Identification of the specific information for which confidential treatment is sought.* MCI requests that the redacted portions of the attached letter be treated as confidential pursuant to Exemption 4 of the Freedom of Information Act, 5 U.S.C. § 552(b)(4), and sections 0.457(d) and 0.459 of the Commission's rules, which protect "commercial... information . . . not routinely available for public inspection." The redacted portions of the letter include confidential commercial information that reveals MCI's current plans to compete for a specific customer and would not customarily be publicly available.

2. *Identification of the Commission proceeding in which the information was submitted or a description of the circumstance giving rise to the submission.* This information is being submitted in response to a request from Commission staff for additional information in the above-captioned docket.

3. *Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged.* The redacted information contains proprietary commercial information regarding MCI's ongoing business and marketing activities. This information would not customarily be publicly available.

4. *Explanation of the degree to which the information concerns a service that is subject to competition.* The redacted information relates to MCI's current plans to compete to offer competitive services, including long distance, calling cards, and other competitive services, to a specific customer.

5. *Explanation of how disclosure of the information could result in substantial competitive harm.* Disclosure of this information would give MCI's competitors insight into its ongoing business activities and would allow them to target this specific customer and gain an unfair competitive advantage, resulting in significant competitive harm.

6.-7. *Identification of any measures taken by the submitting party to prevent unauthorized disclosure, and identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties.* To MCI's knowledge, this redacted information is not publicly available and has not otherwise been disclosed previously to independent third parties.

8. *Justification of the period during which the submitting party asserts that the material should not be available for public disclosure.* The redacted data must be kept confidential for an indefinite period. MCI cannot determine at this time any date certain by which the information could be disclosed without harmful consequences.

9. *Any other information that the party seeking confidential treatment believes may be useful in assessing whether its request for confidentiality should be granted.* Under applicable Commission and federal court precedent, this information should be shielded from public disclosure. Specifically, where disclosure is likely to impair the government's ability to obtain necessary information in the future, it is appropriate to grant confidential treatment to that information. *See National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *see also Critical Mass Energy Project v. NRC*, 975 F.2d 871, 878 (D.C. Cir. 1992) (*en banc*) (recognizing the importance of protecting information that "for whatever reason, 'would customarily not be released to the public by the person from whom it was obtained.'") (citation omitted). Where the confidential information at issue is not customarily disclosed, as is the case here, failure to accord confidential treatment to that information is likely to impair the FCC's ability to obtain such information from parties in future proceedings.

Protective Order Requested. In the event that the Commission declines to grant complete confidentiality to the redacted information, disclosure of that information, other than to a Commission employee working directly on the matter, should be permitted only for counsel signing the Commission's standard protective agreement. If such a request occurs, please

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provide sufficient advance notice to the undersigned prior to any such disclosure to allow MCI to pursue remedies, as appropriate, to preserve the confidentiality of the redacted information.

If you have any questions or require further information regarding this request, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "A. Renée Callahan".

A. Renée Callahan

Attachment

cc: Alex Johns, Competition Policy Division, Wireline Competition Bureau

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Alex Johns
Competition Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Joint Application for Consent to Transfer Control of Military Communications Center, Inc., a Company Holding a Domestic 214 Authorization, from MCI, Inc. to MCC Acquisition Corporation, WC Docket No. 05-223*

Dear Ms. Johns:

In response to staff's request with respect to the above-referenced application, please find below a list of United States military bases currently served by Military Communications Center, Inc. ("MCC"):

BASE NAME	CITY	STATE
Fort Irwin	Fort Irwin	CA
Camp Pendleton	Camp Pendleton	CA
Marine Corp Recruiting Depot	San Diego	CA
Twentynine Palms	Twentynine Palms	CA
Fort Benning	Fort Benning	GA
Fort Stewart	Fort Stewart	GA
Kaneohe	Kaneohe Bay	HI
Great Lakes	Great Lakes	IL
Fort Knox	Fort Knox	KY
Fort Polk	Fort Polk	LA
Edgewood Arsenal	Edgewood	MD

Aberdeen Proving Ground	Aberdeen	MD
Fort Meade	Fort Meade	MD ¹
Fort Leonard Wood	Fort Leonard Wood	MO
Kessler Air Force Base	Biloxi	MS
Camp Lejeune	Camp Lejeune	NC
Fort Sill	Fort Sill	OK
Fort Lee	Fort Lee	VA
Norfolk	Norfolk	VA
[REDACTED]	[REDACTED]	[REDACTED] ²

If you have any questions regarding this matter, please do not hesitate to call me.

Sincerely,



A. Renée Callahan

cc: Marlene H. Dortch, Secretary

¹ Fort Meade, which is provided service pursuant to the same agreement as the Aberdeen Proving Ground and Edgewood Arsenal, was inadvertently omitted from the total number of bases reported in the Application. See Application at 5.

² [REDACTED]